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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- Affects PG&E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF FILING OF AMENDMENT
TO TORT CLAIMANTS
RESTRUCTURING SUPPORT
AGREEMENT**

[Relates to Dkt. No. 5038]

Date: December 17, 2019

Time: 10:00 a.m. (Pacific Time)

Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 **PLEASE TAKE NOTICE** that, on December 9, 2019, PG&E Corporation and Pacific Gas and
2 Electric Company, as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-
3 captioned chapter 11 cases, filed the *Debtors’ Motion Pursuant to 11 U.S.C. §§ 363(b) and 105(a) and*
4 *Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (i) Authorizing the Debtors and TCC to Enter*
5 *into Restructuring Support Agreement with the TCC, Consenting Fire Claimant Professionals, and*
6 *Shareholder Proponents, and (ii) Granting Related Relief* [Docket No. 5038] (the “**Tort Claimants**
7 **RSA Motion**”). A copy of that certain Restructuring Support Agreement, dated as of December 6, 2019,
8 among the Debtors, the TCC, the Consenting Fire Claimant Professionals, and Shareholder Proponents
9 parties thereto (the “**Original Tort Claimants RSA**”) was attached as **Exhibit A** to the Tort Claimants
10 RSA Motion.

11 **PLEASE TAKE FURTHER NOTICE** that, on December 16, 2019, pursuant to Section 7 of
12 the Original Tort Claimants RSA, the Debtors, the Requisite Consenting Fire Claimant Professionals¹,
13 and the Shareholder Proponents agreed to an amendment of the Tort Claimants RSA (the “**Tort**
14 **Claimants RSA Amendment**”) that, among other things, eliminates Section 3(a)(iii) of the Original
15 Tort Claimants RSA that would automatically terminate the Original Tort Claimants RSA if the
16 Governor of California advises the Debtors that their chapter 11 plan does not, in his sole judgment,
17 comply with Assembly Bill 1054 and the chapter 11 plan is not modified in a manner acceptable to the
18 Governor by December 17, 2019.

19 **PLEASE TAKE FURTHER NOTICE** that attached hereto as **Exhibit 1** is a copy of the
20 executed Tort Claimants RSA Amendment.

21 **PLEASE TAKE FURTHER NOTICE** that copies of the Tort Claimants RSA Motion, the
22 Original Tort Claimants RSA, and Tort Claimants RSA Amendment can be viewed and/or obtained: (i)
23 by accessing the Bankruptcy Court’s website at <http://www.canb.uscourts.gov>, (ii) by contacting the
24 Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the
25 Debtors’ notice and claims agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by
26 calling (844) 339-4217 (toll free) for U.S.-based parties; or +1 (929) 333-8977 for International parties
27 or by e-mail at: pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents
28 on the Bankruptcy Court’s website.

29 Dated: December 16, 2019

30 **WEIL, GOTSHAL & MANGES LLP**
31 **CRAVATH, SWAINE & MOORE LLP**
32 **KELLER & BENVENUTTI LLP**

33 /s/ Thomas B. Rupp
34 Thomas B. Rupp

35 *Attorneys for Debtors and Debtors in Possession*

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¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Tort
38 Claimants RSA Motion.